

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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IN RE:  
WILLIAM J APPLETON

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

**Case No.: 23-17074JKS**

**HEARING DATE: 02/13/2025 at 10:00 AM**

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**TRUSTEE'S LIMITED OBJECTION TO DEBTOR(S) MOTION TO APPROVE  
SETTLEMENT**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of limited objection to the Debtor(s) Motion to Approve Settlement, respectfully objects as follows:

- The Trustee objects to the proposed form of order attached to this motion. The proposed order indicates that the net proceeds from the medical malpractice action will be held in escrow until further order of the Court. The Trustee sees three previous plans before the Court that propose to cure the arrears with these proceeds and a 100% plan for the benefit of unsecured creditors. The Trustee proposes to confirm this plan on January 23, 2025, and therefore further requests that all net proceeds be turned over to the Trustee for the benefit of creditors.

It is for this reason and any others the Court deems fit that the Motion to Approve Settlement be denied.

Dated: January 21, 2025

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee